

# GREEN KAMINER MIN & ROCKMORE LLP

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February 21, 2025

## VIA ECF

Honorable Natasha C. Merle  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201  
Email: Merle\_Chambers@nyed.uscourts.gov

Re: *Correa Morales v. Escobar Restrepo – Joint Letter re Witness Schedule*  
Case No. 1:24-cv-07951-NCM-TAM

Dear Judge Merle:

This firm represents the Petitioner in the above captioned Hague Convention proceeding. We write jointly with consent of Respondent's counsel to propose a witness schedule for the evidentiary hearing scheduled for February 24 and 26, 2025, in the above-captioned matter. We believe this will ensure both parties' witnesses are adequately prepared for their testimony.

Pursuant to this Court's order, dated February 20, 2025 (ECF No. 47), the parties jointly propose the following witness schedule:

Petitioner/ Respondent	Witness Name	Date	Time	Estimated Length of Testimony
<b>February 24, 2025</b>				
Petitioner	Elizabeth Gomez	February 24 <sup>th</sup>	9:30am	50 minutes
Petitioner	Sebastian Correa	February 24 <sup>th</sup>	10:20am	3 hours
One hour lunch break				
Petitioner	Jenny Gallego	February 24 <sup>th</sup>	2:30pm	50 minutes
Petitioner	Bibiana Morales	February 24 <sup>th</sup>	3:20pm	50 minutes

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<b>Closing Argument</b>	4:10pm	20 minutes
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<b>February 26, 2025</b>				
Respondent	Juliana Escobar Restrepo	February 26 <sup>th</sup>	9:30am	3 hours
One hour lunch break				
Respondent	Jorge Cadena	February 26 <sup>th</sup>	1:30pm	50 minutes
Respondent	Maria Ocampo	February 26 <sup>th</sup>	2:20pm	30 minutes
Respondent	Juan Ocampo	February 26 <sup>th</sup>	2:50pm	25 minutes
Respondent	Jafet Dominguez	February 26 <sup>th</sup>	3:15pm	30 minutes
Respondent	Ana Escobar	February 26 <sup>th</sup>	3:45pm	25 minutes
<b>Closing Argument</b>			4:10pm	20 minutes

Very truly yours,

/s/Richard Min

Richard Min

*Attorney for Petitioner*

cc: All Counsel (by ECF)